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June 15, 2022

**Via ECF**

Hon. Sarah Netburn, U.S.M.J.  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**Re: Plaintiff's Letter Motion Requesting Extension of Time to Submit the Letter Briefs:**  
*Shi v. TL & CG Inc. et al*, No. 19-cv-08502 (SN), (S.D.N.Y.)

Your Honor,

This office represents Plaintiff in the above-referenced matter. We write respectfully to request this Court to extend the Plaintiffs' time to submit the letter response to address the question of whether Plaintiff Shi has Article III standing to bring his claims for violations of NYLL §195(1) and 195(3) in Federal Court. Defendants Counsel has consented to Plaintiff's request to extend the time to submit the letter brief and is willing to simultaneously file their letter response along with Plaintiff's on June 22, 2022. This is the first request made by Plaintiff and granting such request will not prejudice any party.

Your Honor, ordered on June 9, 2022, for both the parties to simultaneously submit letter briefs, no more than three pages in length, addressing the question of whether Plaintiff Shi has Article III standing to bring his claims for violations of NYLL §§ 195(1) and 195(3) in Federal Court. *See* Dkt. No. 87. However, as of filing this letter, Plaintiff's Counsel is currently in the middle of an ongoing trial in the matter of 1:19-cv-06115-PGG *Chen v. L & H Wine & Liquor, Inc. et al*, and was preoccupied with pretrial submissions in that matter for the last few days. Additionally, Plaintiff's Counsel had to also work on a Second Circuit Court of Appeals Brief in the matter of 22-183 *Hu v. City of New York.*, which was due to the Court on June 13, 2022, and on June 14, 2022, Plaintiff's Counsel was scheduled for an all-day deposition in the matter of 2:20-cv-05264-LDH-ARL *Chen v. P & L Innovations, Inc. et al*. As such, the undersigned had no room to work on the letter response in this matter. Accordingly, Plaintiff's Counsel respectfully requests this Court to extend the parties' time to submit the letter briefs in response to Court's Order dated June 9, 2022, until June 22, 2022, from June 15, 2022. Granting this request will not prejudice any party.

For the foregoing reasons, Plaintiff's Counsel respectfully requests this Court to extend the parties' time to submit the letter briefs addressing the question of whether Plaintiff Shi has Article III standing to bring his claims for violations of NYLL §§ 195(1) and 195(3) in Federal Court until June 22, 2022, from June 15, 2022.

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Southern District of New York

*Shi v. TL & CG Inc. et al*, No. 19-cv-08502 (SN), (S.D.N.Y.)

Page 2 of 2

We thank the Court for its continued attention to this matter and apologize for any inconvenience caused to this Court.

Respectfully Submitted,

/s/ Aaron Schweitzer

Aaron Schweitzer, *esq.*  
*Attorney for Plaintiffs*

Cc: all counsel of record *via* ecf  
/pk